

2/25/08

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TJIAP HOK JOENG,

Plaintiff,

Civil Case No.:
07-CV-9734 (LAK)(GWG)

v.

MARRIOTT INTERNATIONAL, INC.

Defendant.

**REPORT OF PARTIES'
PLANNING MEETING**

OLDER

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Defendant, MARRIOTT HOTEL SERVICES, INC. (improperly plead as Marriott International, Inc.), by its attorneys Norris, McLaughlin & Marcus, PA, sets forth the following Report of Parties' Planning Meeting:

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P.26, an initial conference is scheduled in this case on February 22, 2008 at 10:00 a.m. and will be attended by:

a. For Plaintiff, Tjiap Hok Joeng ("Joeng"):

- Tjiap Hok Joeng, *pro se*, 89-10 Witney Ave., Apt. 6K, Elmhurst, NY 11373;
- b. For Defendant, Marriott Hotel Services, Inc. ("Marriott"):
 - Fernando M. Pinguelo, Esq., Norris, McLaughlin & Marcus, P.A. 875 Third Avenue, 18th Floor, New York, New York 10022, Telephone: (908) 722-0700

2. Pre-discovery Disclosures. The parties will exchange the information required by Fed.R.Civ.P. 26(a)(1), [Initial Disclosures] by March 21, 2008.

3. Discovery Plan. Subject to any Federal Rules of Civil Procedure and/or Local Civil Rules which may be otherwise applicable, or to any order from the Court, the parties jointly propose to the court the following discovery plan:

a. Discovery will be needed on the following subjects:

- 1) Plaintiff's allegations as alleged in his Complaint;

- 2) The allegations previously raised by Plaintiff with the New York Division of Human Rights and the EEOC;
 - 3) Defendant's policies and procedures for distributing overtime and defendant's compliance with such policies and procedures;
 - 4) Defendant's affirmative defenses to Plaintiff's allegations;
 - 5) The extent, nature, severity and amount of Plaintiff's alleged damages, if any; and
 - 6) Plaintiff's employment history, including past behavior problems.
- b. The last date for the completion of all Discovery is September 26, 2008.
- c. Maximum of 15 interrogatories by each party to any other party.
 - d. Maximum of 30 requests for admission by each party to any other party.
 - e. ~~Maximum of 6 depositions anticipated by Plaintiff. Maximum of 3 depositions anticipated by Defendant.~~ Depositions to occur during the month of May 2008.
 - f. The exchanging between counsel and plaintiff *pro se* of reports from retained experts under Rule 26(a)(2) due:
 - (1) from Plaintiff by June 16, 2008, and
 - (2) from Defendant by July 16, 2008.
 - (3) Depositions of Experts to be completed by September 26, 2008.
4. Other Items.
- a. The last date for the parties to join additional parties and to amend the pleadings without leave of the Court is March 31, 2008.
 - b. The last date for the filing of potentially dispositive motions is November 21, 2008.
 - c. The last date for the filing of pretrial motions is January 9, 2009.
 - d. The last date by which plaintiff will supply pretrial order materials to defendant is January 9, 2009.

- e. The date by which the parties will submit a joint pretrial order is January 23, 2009.
5. Proposed Trial Date: After January 23, 2009. Plaintiff elected not to try the case before a jury.

Date: _____

NORRIS, McLAUGHLIN & MARCUS, PA
Attorneys for Defendant

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Tjiap Hok Joeng
Plaintiff *Pro Se*

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G.W.G. 2/22/2008
S ORDERED: DATE:
GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE